

Message

From: LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]
Sent: 3/21/2016 4:06:42 PM
To: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil]; Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]; Franklin, William D CIV NAVFAC HQ, BRAC PMO [william.d.franklin@navy.mil]
CC: zachary.edwards@navy.mil
Subject: More from Dan Hirsch re topic for call/mtg re rad - USEPA's PRG calculator vs other methods

See below more from Dan Hirsch.

We will share with the group at the upcoming meeting that, as you may have seen, during EPA's routine reviews of SUPR's, we use USEPA's PRG calculator to evaluate the residual risks to determine whether or not they are within the EPA risk range. EPA routinely presents those results in our comment letters to the Navy.

Lily Lee
Cleanup Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St. (SFD-8-3)
San Francisco, CA 94105
Tel: 415-947-4187, Fax: 415-947-3518
www.epa.gov/region9/superfund

From: Daniel Hirsch [mailto:dohirsch@ucsc.edu]
Sent: Sunday, March 20, 2016 7:57 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Cc: Walker, Stuart <Walker.Stuart@epa.gov>; Janice Davis <jadadavi@ucsc.edu>; Lucien Martin <lumamart@ucsc.edu>; Maria Caine <mcaine@ucsc.edu>; Janie Flores <jalflore@ucsc.edu>; Liora Huebner <lhuebner@ucsc.edu>; Flora Lu <floralu@ucsc.edu>; bradley@greenaction.org
Subject: request re conference call April 12

Hi Lily,

We would appreciate it if you would arrange for Stuart Walker, the EPA Superfund remedial program's National Radiation Expert, to participate in the conference call on Hunters Point issues scheduled for April 12.

We note that "Radiation Risk Assessment at CERCLA Sites Q&A," (EPA Office of Superfund Remediation and Technology Innovation Directive 9200.4-40, May 2014) states:

"Q10. For CERCLA risk assessments at remedial sites, is it appropriate to use guidance or approaches developed by other Federal, State or Tribal Agencies or by International or National Organizations?"

A. EPA has made the policy decision that risks from radionuclide exposures at remedial sites should be estimated in the same manner as chemical contaminants, which is consistent with EPA's remedial program implementing guidance (e.g., EPA 1997g, 1999d, 2000f). Consequently, approaches that do not follow the remedial program's policies and guidance should not be used at CERCLA remedial sites. Should regional staff have questions, they should consult with the Superfund remedial program's National Radiation Expert (Stuart Walker of OSRTI at the time this fact sheet was issued, at (703) 603-8748 or walker.stuart@epa.gov), before

using guidance from other organizations that is not already incorporated into this and other EPA Superfund remedial program guidance."

Among the issues we wish to explore during the conference call is whether remediation standards, models, and other guidance were used at Hunters Point that are inconsistent with the EPA remedial program's policies and guidance. If so, we would like to understand whether EPA Region IX consulted with Mr. Walker before allowing use of guidance that is not incorporated in EPA Superfund remedial program guidance, and if so, on what basis the approvals were made. If there was no consultation with Mr. Walker, we would like to learn why not.

Thank you.

Daniel Hirsch
Director
Program on Environmental and Nuclear Policy
College Ten
University of California at Santa Cruz